

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTER DISTRICT OF VIRGINIA  
Richmond Division**

IN RE:

ANGELA CARTER-BANKS

Case Number: 19-35923-KRH

Debtor

Chapter 13

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Performance Finance,

Movant

v.

Angela Carter-Banks,

Respondant

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**DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM STAY**

COMES NOW, the Debtor, Angela Carter-Banks, by and through undersigned counsel, Tommy Andrews, Jr., P.C. and Tommy Andrews, Jr. and in response to Movant's said Motion for Relief from Stay states as follows:

1. Debtor generally admits the allegations contained in paragraph 1.
2. Debtor generally admits the allegations contained in paragraph 2.
3. Debtor generally admits the allegations contained in paragraph 3.
4. Debtor generally admits the allegations contained in paragraph 4.
5. Debtor generally admits the allegations contained in paragraph 5.
6. Debtor generally denies the allegations contained in paragraph 6 and demands strict proof thereof.
7. Debtor neither admits nor denies the allegations contained in paragraph 7.
8. Debtor neither admits nor denies the allegations contained in paragraph 8.
9. Debtor generally denies the allegations contained in paragraph 9 and demands strict proof thereof.
10. Debtor generally denies the allegations contained in paragraph 10 and demands strict proof thereof.

Wherefore, the Debtor prays that the Movant's Motion for Relief from Stay imposed by 11 U.S.C. §362 be denied and for such other and further relief as this Honorable Court deems just and proper under the law.

Respectfully Submitted,  
ANGELA CARTER-BANKS,  
By Counsel,

/s/ Tommy Andrews, Jr.  
Tommy Andrews, Jr. #28544  
Tommy Andrews, Jr., P.C.  
122 North Alfred Street  
Alexandria, Virginia 22314  
(703) 838-9004

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of December, 2020, I mailed, first class, postage prepaid or via the electronic court filing system a copy of the foregoing Debtor's Response to Movant's Motion for Relief from Stay to:

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Chapter 13 Trustee  
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/s/ Tommy Andrews, Jr.  
Tommy Andrews, Jr., Esq.